

## Exhibit 1

Documents fabricated by Ostella by copying signature of Taitz from a document created on March 15, 2009 and copied to drafts of documents from January 19, 2009

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Orly Taitz, Esq. 223433 Orly Taitz, Esq. 26302 La Paz, STE 211 Mission Viejo, CA 92691 TELEPHONE NO.: 949-683-5411 FAX NO. (Optional): 949-586-8110 E-MAIL ADDRESS (Optional): dr_taitz@yahoo.com ATTORNEY FOR (Name):		SUBP-010 FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Sacramento STREET ADDRESS: 720 Ninth Street MAILING ADDRESS: CITY AND ZIP CODE: Sacramento, CA 95815 BRANCH NAME:		
PLAINTIFF/PETITIONER: Amb. Dr. Alan Keyes, Wiley S. Drake and Markham Robinson DEFENDANT/RESPONDENT: Bowen, Obama, Biden et al		CASE NUMBER: 34-2008-8000096-CU-WM-GDS
<b>DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS</b>		

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of defendant, if known):

Robert S. Mueller, III Director - US Immigration and Customs Enforcement  
500 I<sup>2</sup> St. SW, Washington, DC 20535-0001

## 1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in Item 3, as follows:

To (name of deposition officer): Orly Taitz, Esq.	At (time): 10:00AM
On (date): 02/20/2009	
Location (address): 26302 La Paz STE 211 Mission Viejo, CA 92691	

Do not release the requested records to the deposition officer prior to the date and time stated above.

- a.  by delivering a true, legible, and durable copy of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
  - b.  by delivering a true, legible, and durable copy of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1583(b).
  - c.  by making the original business records described in item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.
2. The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1583(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1581.

## 3. The records to be produced are described as follows:

Per Executive Order from January 16, 2009, any and all documents relating to "fitness and determination" in regards to level of character and conduct necessary to perform work for or on behalf of a Federal Agency in regards to Barack Hussein Obama.

 Continued on Attachment 3.

## 4. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.

<b>DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.</b>
--

Date Issued: January 19, 2009

Dr. Orly Taitz, Esq.  
(TYPE OR PRINT NAME)

(Proof of service on reverse)

Form Adopted for Mandatory Use  
Judicial Council of California**DEPOSITION SUBPOENA FOR PRODUCTION  
OF BUSINESS RECORDS**Notice Issued 6/2004  
WWW.LawC.California  
Law PublishersCode of Civil Procedure  
§§ 2030.410-2020.440

Exhibit "D"

pg. 55

AER 1465

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Orly Taitz, Esq 223433 Orly Taitz, Esq 26302 La Paz, STE 211 Mission Viejo, CA 92691 TELEPHONE NO.: 949-586-8116 FAX NO. (if any): E-MAIL ADDRESS (if any): dr_taitz@yahoo.com		FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Sacramento STREET ADDRESS: 720 Ninth Street MAILING ADDRESS: CITY AND ZIP CODE: Sacramento, CA 95815 BRANCH NAME:		
PLAINTIFF/PETITIONER: Ambassador Dr. Alia Keyes; Wiley S. Drisko and Matthew Robinson. DEFENDANT/RESPONDENT: Bowen, Obama, Biden et al		
DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS		Case Number:

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):

US Attorney, 219 S. Dearborn St. 5<sup>th</sup> Floor Honorable Patrick Fitzgerald  
Chicago, IL 60604

**1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in Item 3, as follows:**

To (name of deposition officer): Orly Taitz, Esq.  
On (date): 02/20/09 At (time): 10:00am  
Location (address): 26302 La Paz STE 211 Mission Viejo, CA 92691

Do not release the requested records to the deposition officer prior to the date and time stated above.

- a.  by delivering a true, legible, and durable copy of the business records described in Item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in Item 1.
  - b.  by delivering a true, legible, and durable copy of the business records described in Item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1863(b).
  - c.  by making the original business records described in Item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.
2. The records are to be produced by the date and time shown in Item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1863(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1861.

3. The records to be produced are described as follows:

Per Executive Order from January 16, 2009, any and all documents relating to "diligence and determination" in regards to level of character and conduct necessary to perform work for or on behalf of a Federal Agency.

- Continued on Attachment 3.
- 4. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1988.3 OR 1988.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE APPOINTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.

**DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.**

Date issued: January 19, 2009

Dr. Orly Taitz, Esq.  
(Type or print name)

(Proof of service on attached)

Form Adopted for Mandatory Use  
Judicial Council of California  
REV. 12/01/2002 (2002-042)

DEPOSITION SUBPOENA FOR PRODUCTION  
Form 100-100-100 (Rev. 12/01/2002)

RECEIVED  
FEB 19 2009  
CLERK OF COURT  
SACRAMENTO SUPERIOR COURT  
BY [Signature]

Date of Court Production:  
02/20/09  
Time of Court Production:  
10:00 AM  
Place of Court Production:  
[Signature]

Exhibit "D"

<p>ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, Street address, city, state and zip code):  <b>Orty Taitz, Esq</b>  <b>Orty Taitz, Esq</b>  <b>26302 La Piz, STE 211 Mission Viejo, CA 92691</b>  <b>TELEPHONE NO.:</b> <b>FAX NO. (if any):</b> <b>949-586-8110</b>  <b>E-MAIL ADDRESS (if any):</b>  <b>ATTORNEY FOR PLAINTIFFS dr_taitz@yahoo.com</b></p>	<p>FOR COURT USE ONLY <b>SUPERP-01</b></p>
<p><b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF:</b> <b>SACRAMENTO</b>  <b>STREET ADDRESS:</b> <b>720 N State Street</b>  <b>MAILING ADDRESS:</b>  <b>CITY AND ZIP CODE:</b> <b>Sacramento, CA 95815</b>  <b>JURISDICTION:</b></p>	
<p><b>PLAINTIFF/PETITIONER:</b> Ambassador Dr. Alan Keyes; Wiley S. Drake and Merleann Robinson</p>	
<p><b>DEFENDANT/RESPONDENT:</b> Bowen, Obama, Biden et al</p>	
<p><b>DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS</b></p>	
<p><b>CASE NUMBER:</b></p>	

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of reporter, if known):

US Attorney, 219 S. Dearborn St. 5<sup>th</sup> Floor

33 Academy, 219 S  
Chicago, IL 60604

1. TO LAKE ORDERED TO PRODUCE THE PLANS AND RECORDS DESCRIBED IN ITEM 3, AS FOLLOWS:

To (name of deposition officer): Only Tracy, Esq.

On (date): 02/20/02

At 6:00pm - 10:00pm

(CONTINUED) 26302 LA PINE STE 211 Mission Viejo, CA 92691

- Do not return the requested records to the deposition officer prior to the date and time stated above.*

  - a.  by delivering a true, legible, and durable copy of the business records described in Item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in Item 1.
  - b.  by delivering a true, legible, and durable copy of the business records described in Item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1863(b).
  - c.  by making the original business records described in Item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.

2. The records are to be produced by the date and time shown in Item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1863(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.

3. The records to be produced are described as follows:

Per Executive Order from January 6, 2009, any and all documents relating to "Glosses and determinations" in regards to level of character and conduct necessary to perform work for or on behalf of a Federal Agency.

Continue on Attachment 3.

4. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1982 OR 1986 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date Received: January 19, 2009

Dr. Orly Traitz, Eng.  
(TYPE OR PRINT NAME)

Page 1 of 10 pages

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Code of Civil Procedure

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Printed Authorization for Interim Facility Use

#### **REPORTS FROM THE FIELD**

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Code of Civil Procedure

## Exhibit "D"

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Orly Taitz, Esq. 223433 Orly Taitz, Esq. 26302 La Paz, STE 211 Mission Viejo, CA 92691 TELEPHONE NO.: 949-683-5411 FAX NO. (optional): 949-586-8110 EMAIL ADDRESS (Optional): dr_taitz@yahoo.com ATTORNEY FOR (Name):		POLICE OFFICER (Name): FINGERPRINTS: SUBPOENA NUMBER:
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Sacramento STREET ADDRESS: 720 Ninth Street MAILING ADDRESS: CITY AND ZIP CODE: Sacramento, CA 95815 BRANCH NAME:		
PLAINTIFF/PETITIONER: Amb. Dr. Alan Keyes, Wiley S. Drake and Markham Robinson DEFENDANT/RESPONDENT: Bowen, Obama, Biden et al		CASE NUMBER: 34-2008-80000096-CU-WM-GDS
<b>DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS</b>		

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):

Mike Hayden - Central Intelligence Agency  
Office of Public Affairs, Washington, DC 20505

**1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in Item 3, as follows:**

To (name of deposition officer): Orly Taitz, Esq.  
On (date): 02/20/2009 At (time): 10:00AM  
Location (address): 26302 La Paz STE 211 Mission Viejo, CA 92691

Do not release the requested records to the deposition officer prior to the date and time stated above.

- a.  by delivering a true, legible, and durable copy of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
  - b.  by delivering a true, legible, and durable copy of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
  - c.  by making the original business records described in item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.
2. The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.

**3. The records to be produced are described as follows:**

Per Executive Order from January 16, 2009, any and all documents relating to "fitness and determination" in regards to level of character and conduct necessary to perform work for or on behalf of a Federal Agency in regards to Barack Hussein Obama.

Continued on Attachment 3.

4. **IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.**

**DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.**

Date issued: January 19, 2009

Dr. Orly Taitz, Esq.  
(TYPE OR PRINT NAME)

(Proof of service on reverse)

Form Adopted for Mandatory Use  
Judicial Council of California

DEPOSITION SUBPOENA FOR PRODUCTION  
OF BUSINESS RECORDS

(TITLE)  
RECORDED ON: 9-2005  
RECORDED BY: [Signature]  
Law Publishers

Code of Civil Procedure  
§§ 2020.410-2020.440  
RECORDED ON: 9-2005  
RECORDED BY: [Signature]  
Law Publishers

Exhibit "D"

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address) Orly Taitz, Esq. 223433 Orly Taitz, Esq. 26302 La Paz, STE 211 Mission Viejo, CA 92691 TELEPHONE NO: 949-683-5411 FAX NO. (Optional): 949-586-8110 E-MAIL ADDRESS (Optional): dr_taitz@yahoo.com ATTORNEY FOR (Name):		FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Sacramento STREET ADDRESS: 720 Ninth Street MAILING ADDRESS: CITY AND ZIP CODE: Sacramento, CA 95815 BRANCH NAME:		
PLAINTIFF/PETITIONER: Amb. Dr. Alan Keyes, Wiley S. Drake and Markham Robinson DEFENDANT/RESPONDENT: Bowen, Obama, Biden et al		CASE NUMBER: 34-2008-80000096-CU-WM-GDS
<b>DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS</b>		

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):

Michael W. Hager - Office of Personnel Management  
1900 E. Street NW, Washington, DC 20415

**1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in Item 3, as follows:**

To (name of deposition officer): Orly Taitz, Esq.

On (date): 02/20/2009

At (time): 10:00AM

Location (address): 26302 La Paz STE 211 Mission Viejo, CA 92691

Do not release the requested records to the deposition officer prior to the date and time stated above.

- a.  by delivering a true, legible, and durable copy of the business records described in Item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
  - b.  by delivering a true, legible, and durable copy of the business records described in Item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
  - c.  by making the original business records described in Item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.
2. The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.
3. The records to be produced are described as follows:
- Per Executive Order from January 16, 2009, any and all documents relating to "fitness and determination" in regards to level of character and conduct necessary to perform work for or on behalf of a Federal Agency in regards to Barack Hussein Obama.

Continued on Attachment 3.

4. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.5 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.

**DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.**

Date issued: January 19, 2009

Dr. Orly Taitz, Esq.  
(TYPE OR PRINT NAME)

(Proof of service on reverse)

Form Adopted for Mandatory Use  
Judicial Council of California

DEPOSITION SUBPOENA FOR PRODUCTION  
OF BUSINESS RECORDS

(TITLE)

Code of Civil Procedure  
1985.5

Exhibit "D"

pg. 60

#18464  
Case# 8-19-24254-BRO Document 50-1 Filed 01/21/20 Entered 01/21/20 05:55:54 Page 8 of 54  
2021-01-21 23:44:00 ETCD/BB/MSB/Bulletin  
EXCELSIOR GLOBAL INC  
#6064

<p>ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):          Orly Taitz, Esq. 223433          Orly Taitz, Esq.          26302 La Paz, STE 211 Mission Viejo, CA 92691          TELEPHONE NO: 949-683-5411 FAX NO. (optional) 949-586-8110          E-MAIL ADDRESS (optional): dr_taitz@yahoo.com          ATTORNEY FOR (Name):</p>	<p>FOR COURT USE ONLY</p>
<p>SUPERIOR COURT OF CALIFORNIA, COUNTY OF Sacramento          STREET ADDRESS: 720 Ninth Street          MAILING ADDRESS:          CITY AND ZIP CODE: Sacramento, CA 95815          BRANCH NAME:</p>	
<p>PLAINTIFF/PETITIONER: Amb. Dr. Alan Keyes, Wiley S. Drake and Markham Robinson          DEFENDANT/RESPONDENT: Bowen, Obama, Biden et al</p>	
<p><b>DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS</b></p>	<p>CASE NUMBER:          34-2008-80000096-CU-WM-GDS</p>

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of department, if known):

Margaret Spellings - Department of Education  
400 Maryland Avenue SW, Washington, DC 20202  
[www.ed.gov](http://www.ed.gov) | [www.ed.gov/ocr](http://www.ed.gov/ocr) | [www.ed.gov/ocr/ed-ocr](http://www.ed.gov/ocr/ed-ocr) | [www.ed.gov/ocr/ed-ocr/ed-ocr](http://www.ed.gov/ocr/ed-ocr/ed-ocr)

- 1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in Item 3, as follows:**

To (name of deposition officer): Orly Taitz, Esq.  
 On (date): 02/20/2009 At (time): 10:00AM  
 Location (address): 26302 La Paz STE 211 Mission Viejo, CA 92691

**Do not release the requested records to the deposition officer prior to the date and time stated above.**

a.  by delivering a true, legible, and durable copy of the business records described in Item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.

b.  by delivering a true, legible, and durable copy of the business records described in Item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).

c.  by making the original business records described in Item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.

2. The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.

3. The records to be produced are described as follows:

Per Executive Order from January 16, 2009, any and all documents relating to "fitness and determination" in regards to level of character and conduct necessary to perform work for or on behalf of a Federal Agency in regards to Barack Hussein Obama.

Continued on Attachment 3.

4. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.8 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: January 19, 2009

Dr. Orly Taitz, Esq.  
(TYPE OR PRINT NAME)

#### Journal of services on structures

**Form Adopted for Mandatory Use  
Atticier Council of California**

**(FOOT OR SERVICE ON REVERSE)**

**DEPOSITION SUBPOENA FOR PRODUCTION**

Code of Civil Procedure  
§ 2020.410–2020.640

**Exhibit "D"**

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#6059

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of 54

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Orly Taitz, Esq. 223433 Orly Taitz, Esq. 26302 La Paz, STE 211 Mission Viejo, CA 92691 TELEPHONE NO. 949-683-5411 FAX NO. (Optional) 949-586-8110 E-MAIL ADDRESS (Optional): dr_taitz@yahoo.com	
ATTORNEY FOR (Name):	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Sacramento STREET ADDRESS: 720 Ninth Street MAILING ADDRESS: CITY AND ZIP CODE: Sacramento, CA 95815 BRANCH NAME:	
PLAINTIFF/PETITIONER: Amb. Dr. Alan Keyes, Wiley S. Drake and Markham Robinson	
DEFENDANT/RESPONDENT: Bowen, Obama, Biden et al	
CASE NUMBER: 34-2008-80000096-CU-WM-GDS	
DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS	

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of defendant, if known):

Central Intelligence Agency

Central Intelligence Agency  
Office of Public Affairs, Washington, DC 20505

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in Item 3, before 10 A.M. on June 25, 1968.

To (name of deposition officer): Orly Taitz, Esq.

On (date): 02/20/2009

Location (address): 26302 La Paz STE 211 Mission Viejo, CA 92691

At (time): 1:00AM

*Do not release the requested records to the deposition officer prior to the date and time stated above.*

- a.  by delivering a true, legible, and durable copy of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena, only written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to deposition officer at the address in item 1.

b.  by delivering a true, legible, and durable copy of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs sparing the copy, as determined under Evidence Code section 1563(b).

c.  by making the original business records described in item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.

2. The records are to be produced by the date and time shown in item 1 (but not sooner than 15 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of producing records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.

3. The records to be produced are described as follows:

5. The records to be produced are described as follows:

Per Executive Order from January 16, 2009, any and all documents relating to "fines" in regards to level of character and conduct necessary to perform work for or on behalf of a Federal Agent is to Barack Hussein Obama.

Continued on Attachment 3.

**4. IF YOU HAVE BEEN SERVED WITH**

CODE OF CIVIL PROCEDURE SECTION 1988.3 OR 1985.8 AND A MOTION TO  
SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITER OR EMPLOYEE RECORDS  
AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE IT.

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT IN YOUR FAILURE TO COMPLY WITH IT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RE

Date issued: January 19, 2009

Dr. Orly Taitz, Esq.

*(Proof of service on me)*

Form Adopted for Mandatory Use  
Attorney Council of California

**DEPOSITION SUBPOENA F.C.**  
**OF BUSINESS RE:**

(M.R.E.)

Code of Civil Procedure  
§ 2020-410-2020-410

**Exhibit "D"**

pg. 56

AER 1466

Attorney General, Eric H.

Page 2 of 2

Such negligence and misprision threaten to nullify these essential safeguards. Thus Relators request this Quo Warranto be related to the Supreme Court under its original jurisdiction.

Enclosed is a summary motion for leave to file Quo Warranto on Barack Hussein Obama II aka Barry Soetoro, with the Supreme Court. The list of Questions Presented is attached. A full brief supporting this motion is in preparation.

- 1) Relators respectfully pray that the Attorney General recuse himself over bringing this Quo Warranto for the United States on Barack H. Obama II, by reason of intrinsic conflict of interest.
- 2) Relators pray the Attorney General appoint a Special Assistant (prosecutor) of Archibald Cox's reputation and expertise, to relate this Quo Warranto to the Supreme Court per 28 USC 513.
- 3) Relators request that their attorney, Orly Taitz, ESQ DDS, assist in relating this Quo Warranto, being recognized at bar before the Supreme Court.
- 4) Relators further request the assistance of Patrick Fitzgerald, United States Attorney General for the Northern District of Illinois, as having familiarity with issues involving Barack H. Obama II while Senator from Illinois and as President Elect.
- 5) Relators request guidance from the Attorney General, within one week of filing this motion, as to information, regarding his decision on whether to appoint such a Special Assistant.

With respect, in absence of such guidance, Relators will proceed to request the Attorney General to relate this Court to relate information for this Quo Warranto on Mr. Obama to test his title.

Yours Sincerely,



Orly Taitz, ESQ  
Attorney for Relators  
26302 La Paz  
Mission Viejo, CA 92691  
949-683 5411

Encl. Motion to Supreme Court for leave to relate  
his title to the Federal offices of the USA.

SENIOR CITIZENS TAX EXEMPTION FORM									
I. Complete Name: Archibald Cox, Jr. 197 - Reservoir Dr., Apt. #200 El Cajon, CA 92021-3200 Social Security No.: 443-44-1234 Date of Birth: 10/10/1927 Date of Death: 07/07/2004 Age at Death: 76									
II. Complete Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired.									
a. Print your name and address on the reverse so that we can return the card to you. b. Attach this card to the back of the monthly or quarterly payment slip.									
c. File in Acknowledged log.									
III. Article Number (Printed from service log)									
PS Form 3811, February 2004									
Domestic Return Receipt									

SENIOR CITIZENS TAX EXEMPTION FORM									
I. Complete Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired.									
a. Print your name and address on the reverse so that we can return the card to you. b. Attach this card to the back of the monthly or quarterly payment slip.									
c. File in Acknowledged log.									
IV. Article Number (Printed from service log)									
PS Form 3811, February 2004									

Attn: Hon. Eric H. Holder Jr.  
U.S. Department of Justice  
950 Pennsylvania Avenue NW  
Washington DC 20530 USA

Re: James Earl-Graef Holder  
Re: Request Special Assistant for the United States to relate Quo Warranto on Barack Hussein  
Obama, II, testing his Title to President before the Supreme Court

Relators: Army General Carroll Childers, Ret; Lt. Col Dr. David Earl-Graef; Navy and Police officer  
Lt. Col Dr. James Li; Sean Easterling, currently serving in Iraq; Major James Cannon, US Marine  
Corps; New Hampshire State Representative Mr. Timothy Comerford; Tennessee State  
Representative Mr. Frank Nicely, State of Alabama 2008 electoral college elector Mr. Robert Cusanelli  
and numerous others. Relators request that the Quo Warranto on Barack Hussein Obama, II, testing his title to President per  
the attached letter. Relators include:

Mr. Carroll Childers, Elector for 7<sup>th</sup> District, State of Alabama, in the 2008 Electoral College;  
Mr. Sean Easterling, State Representative of Tennessee in his official capacity;  
Mr. James Cannon, State Representative of New Hampshire in his official capacity;  
Mr. Robert Cusanelli, Lt. Col Dr. David Earl-Graef, Carroll Childers, 29<sup>th</sup> Infantry Div VA retired, lifetime subject to recall; Numerous

awards, including Distinguished Service Medal, DOD LG US Army on active duty in Iraq;  
Mr. Sean Easterling, Long Beach Police Officer & CDR/0-5 US Navy (Active Reserve). Numerous  
awards, including two National defense medals, two Navy commendation medals  
and one Navy Meritorious Service Medal; Lieutenant Colonel Air Force MC, Military Surgeon- Active Reserve. Numerous  
awards, including three Air Force outstanding unit with valor.

Mr. James Cannon, US Marine Corps, Ret, lifetime subject to recall. Numerous awards, including  
two Purple Hearts and two Purple Hearts

Relators are persons of standing. Relators are affected by actions of Respondent Obama and the  
actions of Respondent Obama, II, and thus have interest above citizens.

Quo Warranto against a Federal Officer is normally related to the Attorney General to  
the Office of the Attorney General in U.S. District court of the District of Columbia per DC Code 16-  
1001. The Attorney General defends the office of President and is appointed by the President.  
Testing Quo Warranto on the President raises an intrinsic conflict of interest.  
For example, if a Special Prosecutor or Independent Counsel was appointed to eliminate  
President Nixon, e.g., Attorney General Elliot Richardson appointed Archibald Cox as the  
Special Prosecutor over issues touching on President Nixon.

Quo Warranto includes action between the United States ex rel. and the State of  
Hawaii, regarding records of Barack H. Obama II being withheld per Hawaii's privacy laws.  
The constitutional duties of election officers to validate or evaluate President  
electors are set forth in Article II, U.S. CONST. which becomes President under U.S. CONST. art II - 1 and Amend. XX - 3.

Relators contend that Respondent Obama failed to submit prima facie evidence of his qualifications before  
the election. Relators contend that election officers failed to challenge, validate or evaluate his qualifications. Relators  
contend that Respondent Obama failed qualify per U.S. CONST. Amend. XX - 3.

**Exhibit 2**

**Evidence from Internet Archive -Wayback Machine**

**Ostella is using the picture of Orly Taitz, President of Defend Our Freedoms Foundation and the name of the foundation after her taking over the website and soliciting donations that go to her own pocket.**

**Sign says:"Help offset the cost of Defend Our Freedoms"**

**PayPal Donate button underneath**

Menu

Inbox (5.6) CareCredit Inbox 42 CM/ECF Edit Post GP WOW! Li Clinton's Track My DEFENDO Forbes DRUDGE

http://web.archive.org/web/20090429061430/http://defendourfreedoms.net/

26 captures 8 Feb 09 - 8 Oct 10 Go FEB APR MAR 29 2009 2010 Close Help

INTERNET ARCHIVE Wayback Machine

## DEFEND OUR FREEDOMS

where we're loyal to liberty and faith gives reason for citizen action - amb. alan keyes 2009

MORE DELAYS, USA/OBAMA SAY THEY NEED 124-DAYS TO ANSWER: CONGRESS 117 DAYS

<http://puzo1.blogspot.com/2009/04/more-delays-usaobama-say-they-need-124.html>

Tuesday, April 28, 2009  
More Delays. USA/Obama Say They Need 124-Days to Answer; Congress 117 Days  
See the copy of the court documents electronically filed by the defendants on Monday, April 27, 2009: <http://www.scribd.com/doc/14705757/>

The lawyer for USA and Obama, Elizabeth A. Pascal, who works in the office of Ralph J. Marra, Acting United States Attorney, is now asking the Court a second time through her motion for more time to answer for the defendants.

Initially, Ms. Pascal only represented the USA and Obama, whose answers or motions were initially due on April 27, 2009. Ms. Pascal requested and obtained an extension to file her responses to May 5, 2009. Now Ms. Pascal states in her declaration that former Vice President Cheney, the House of Representatives, and Speaker Pelosi have asked that the Department of Justice represent them in the action. She adds that the Justice Department is also deciding which Congressional defendants (meaning Congress, Senate, House, Cheney, and Pelosi) it will represent. Pending the Justice Department making that decision, she is moving the Court for an order allowing all the Congressional defendants more time to answer or otherwise move. She includes in her request additional time for the USA and Obama to answer, whose answers are now due on May 5, 2009.

Ms. Pascal made her motion returnable June 1, 2009 and is asking for an order that she be allowed to file an answer or otherwise move within 20 days of the date of the order to be entered by Magistrate Judge Joel Schneider. This means that if Magistrate Judge Schneider signs the extension order on June 1, 2009, the defendants' answers or motions will be due by June 21, 2009.

Whether or not the President of the United States is eligible for the Office he currently occupies is of ultimate importance. Every passing day Mr. Obama takes an executive action that significantly impacts on the lives of Americans and the economy and is testing the limits of his authority to answer to May 5, 2009. They have therefore been given 77 days to answer. This is enough time for them to answer. With an extension to June 21, 2009, USA and Obama are asking for 124 days and the Congressional defendants are asking for 117 days to answer. Court rules only allow them 60 days. Such delay is not in the national interest and not acceptable. As to the Congressional defendants, a twenty-day extension for them to answer is reasonable, making their answer due by May 18, 2009. Given the national importance of the issues, an extension for all defendants to answer by June 21, 2009 is not acceptable.

National Press Club

BACK TO MAIN PAGE

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[DefendOurFreedoms.TV](#)

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HELP OFFSET THE COSTS OF DEFEND OUR FREEDOMS

[Donate](#)

VISA MASTERCARD AMEX

6:57 AM 10/19/2016

**Exhibit 3**

**Unauthorized Mother's Day letter promoting Berg sent by Ostella**

**Without consent of Taitz and DOFF Ostella used the website and e-mails for DOFF to promote  
opposing attorney Philip Berg**

DEFEND OUR FREEDOMS  
defend our freedoms from the absence of privacy

HAPPY MOTHER'S DAY !!!



  
**Obama Crimes**  
<http://philbergsoabana.com>

**HAPPY MOTHER'S DAY !!!**

Dear **Obama Crimes** supporter:

Phil Berg here - with a lot to report.

Delays caused by webmaster disappearing - new one on board.

A lot is happening !! Three [3] cases of mine pending against Obama !!

One in Third Circuit Court of Appeals [Berg vs. Obama] - \* \* \* Oral argument SCHEDULED end of May / beginning of June - waiting for exact date - this is case on "Standing !"

One case in District of Columbia Court of Appeals [Hollister vs. Soetoro a/k/a Obama] - Interpleader case where retired Air Force Colonel wants to know, if recalled, does he obey a valid Order from a legitimate President or can he disobey an Order from a Usurper, a person Constitutionally ineligible to be President. PLEASE SEE "ATTACHED" PRESS RELEASE.

One case - "Under Seal" - cannot be discussed.

I NEED YOUR HELP !! I need each of you to spread the word to more of your friends, relatives and neighbors. Send **Obama Crimes** to EVERYONE on your address file and ask them to send to

[Defend Our Freedoms from the absence of Privacy](#)  
[Defend Our Freedoms TV](#)  
[Shop DOF](#)

**RECOMMEND**

[James Communist](#)  
[Germany's Master Plan The Story of Industrial Offensive](#)  
[Robert W. Young, the Populist of Wall Street](#)  
[Nazism, America's Corporate Connections to Hitler's Holocaust](#)  
[The Difference Between God and Lam, Ellison, "God Doesn't Think He's Lam, Ellison](#)  
[The Info-Media, Science, Business, and New Age Alchemy, on the Santa Fe Plateau](#)

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Search only in titles:  
 [Search](#) [Advanced Search](#)

**LOGIN**  
[Login to Post](#)

 8:59 PM  
5/21/2011

**Exhibit "A"**

**Pg. 11**

**EXHIBIT 4**

**BOGUS LINKEDIN ACCOUNT DEFAMING TAITZ, CLAIMING  
TAITZ HAS ONLY MASTER IN LAW, NOT JD, WHICH MAKES HER  
INELIGIBLE TO PRACTICE LAW AND THAT SHE HAS A PHD IN  
DENTISTRY, NOT DDS, WHICH MAKES HER INELIGIBLE TO  
PRACTICE DENTISTRY**



## Dr. Orly Taitz

Dr. Orly Taitz at Dr. Orly Taitz

Orange County, California Area  
Legal Services

Current      Orly Taitz Attorney  
Previous    Dr. Orly Taitz  
Education   Taft Law School

0 connections

Join LinkedIn & access Dr. Orly's full profile. It's free!

As a LinkedIn member, you'll join 300 million other professionals who are sharing connections, ideas, and opportunities.

- See who you know in common
- Get introduced
- Contact Dr. Orly directly

[View Dr. Orly's Full Profile](#)

### Background

#### Summary

Dr. Orly Taitz is an American dentist, lawyer, former real estate agent, and leading figure in the "birther" movement, which challenges whether Barack Obama is a natural-born citizen eligible to serve as President of the United States. Dr. Orly Taitz also promotes a number of other allegations both related and unrelated to Obama, and has initiated a number of lawsuits on behalf of the "birther" movement. Dr. Orly Taitz was born to a Jewish family in Chișinău, Moldavian SSR in the Soviet Union (present day Moldova). Both of her parents were science teachers. In 1981, Dr. Orly Taitz immigrated to Israel, where she obtained a dentistry degree at Hebrew University. In 1987, Dr. Orly Taitz met Yosef Taitz who proposed four months later. Orly immigrated to the United States in May 1987, marrying the Latvian-born Yosef in Las Vegas, Nevada. Dr. Orly Taitz became a naturalized United States citizen in 1992. Dr. Orly Taitz received her law degree from Taft Law School and was admitted to practice law in California in December 2002.

Dr. Orly Taitz lives in Laguna Niguel, California and owns dental practices in nearby Mission Viejo and Rancho Santa Margarita. Dr. Orly Taitz has three sons, holds a second degree black belt in Taekwondo, and speaks five languages; English, Hebrew, Romanian, Russian and Spanish.

Before her national news exposure, Dr. Orly Taitz was quoted in The Orange County Register in 2006 supporting Israeli military actions against Hamas and Hezbollah, and downplaying the impact of the espionage trial of two American Israel Public Affairs Committee staffers (charges against both were subsequently dropped). Dr. Orly Taitz has also said that she lost relatives in the Holocaust and that her grandmother witnessed the Kishinev pogrom.

Specialties: dentist, lawyer, former real estate agent

### Experience

#### Lawyer

Orly Taitz Attorney

January 2002 – Present (13 years 1 month)

#### Dentist

Dr. Orly Taitz

January 1981 – January 1992 (11 years 1 month) Israel

Dr. Orly Taitz

### Skills

- Dentistry
- Law
- Dr. Orly Taitz

## Education

### Taft Law School

Masters, Law

1996 – 2002

### Hebrew University

Ph.D in Dentistry, Dentistry

1979 – 1987

## **EXHIBIT 5**

### **DECLARATION OF BRUCE WILTSE**

October 23, 2016

To Whom it May Concern:

For about the last eight years I have been following the actions of Dr. Orly Taitz on her Internet web page titled Defend Our Freedom Foundation (DOFF). During this time I was normally able to find her Web Page on the Internet and then the address for the DOFF changed. I would not have known about this change if it had not been for a call from Dr. Taitz providing me with the new address.

Sincerely,



Bruce M. Wiltse

374 Country Club Ln

Napa, CA 94558

**EXHIBIT 6**

**DECLARATION OF JEFF LICHTER**

DECLARATION OF JEFF LICHTER

1. I, Jeff Lichter, am over 18 years old and have personal knowledge of the foregoing.
2. I have been a supporter of Orly Taitz from 2008. I followed her legal actions relating to the Constitutional law and public interest.
3. From around 2009 I have been receiving e-mails from Shirley Waddell, mother of Lisa Liberi. *delivered by*
4. In her e-mails Waddell fabricated defamatory statements about Orly Taitz.
5. Waddell made defamatory statements accusing Orly Taitz of stalking Waddell's daughter, Lisa Liberi, even though Waddell did not provide any specific evidence of stalking.
6. Waddell defamed Taitz alleging that Taitz asked her associates to lie in court.
7. Waddell made defamatory statements accusing Taitz of not being truthful.
8. Waddell tried to misrepresent Liberi's criminal record, which was exposed by Taitz, alleging that Taitz publishes filth.
9. Waddell defamed Taitz and her husband and accused Taitz and her husband of illegal spying on people.
10. Waddell defamed Taitz by accusing Taitz of committing crimes.
11. Waddell defamed Taitz and accused Taitz of posting "video filth" on line on the web site for DOFF and suggested that Taitz possibly tapped into the computer of Waddell to receive Waddell's e-mails.
12. Waddell wrongfully claimed that Taitz tried to become a partner with Philip Berg, a Pennsylvania attorney, who at the time was tried by the Pennsylvania attorneys' bar and ultimately permanently disbarred.
13. Waddell called Taitz a "vampire parasite."
14. Waddell wrongfully claimed that a number of individuals convicted of crimes were employees of Taitz.
15. Waddell fabricated accusations against the husband of Taitz of creating a forged birth certificate that President Obama is using.
16. Waddell defames Taitz and her husband by stating "Taitz and her husband have malware and spyware (they create themselves) that they deposit on other computers to gather information that is sent back to their own servers. They like to crawl around inside other people's computers and spy on private information."
17. I declare that all the above is true and correct to the best of my knowledge and informed belief

Jeff Lichter

Address

4433 E. W. 1st Street

State of California

Phone

(407) 861-6903

County of

ORANGE

S.S.

Subscribed and sworn to (or affirmed) before me on this

11 day of Dec

2015, by

Jeff Lichter

and

he

, proved to me on the basis of

satisfactory evidence to be the person(s) who appeared before me

JKH



12/12/2015

Liberi, et al v. Taitz, et al, U.S. District Court, Eastern District of PA, Case No. 09-cv-01847-AJW

#18478

lichterjeff@msn.com waddell

[Move to Inbox](#)

Gmail

Please find attached hereto Plaintiffs' Exhibit "1", the Affidavit of K. Stre...

**Inbox (41,741)**

Starred

Important

Sent Mail

Drafts (1,139)

Circles

**Friends (2,797)****Family (184)****Acquaintances (1...****Following (437)****Brent (7)**

Interesting

paypal and donations

doners

More

**Philip Berg**

Please find attached hereto the Affidavit of K. Strebel Exhibits "U"- "V" to P...

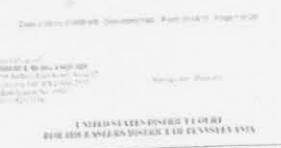
**Jeff LICHTER <lichterjeff@msn.com>**

to me

Date: Sat, 25 Sep 2010 10:41:36 -0700

From: [swdewaddell@att.net](mailto:swdewaddell@att.net)

Subject: Fw: Fwd: Liberi, et al v. Taitz, et al, U.S. District Court, Eastern Dis...

To: [lichterjeff@msn.com](mailto:lichterjeff@msn.com)**4 Attachments**[Liberi, et al Oppo..](#)[Waddell Affidavit .](#)A  
2.

1.



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**EXHIBIT 7**

**FORGERY OF THE OFFICIAL COURT RECORD  
14 PAGES OF DAMAGING CROSS EXAMINATION OF  
OSTELLA REMOVED**

●  
●  
●

Fri, Jan 7, 2011 at 11:45 AM

Jan 7, 2011

from Donna Anders to you

**Liberi v. Taitz, et al**

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From

● [Donna Anders](#)

To

● [dr\\_taitz@yahoo.com](#)

● 1 Attachment

● 2.5MB

● [Save to](#)

● PDF

R12-20-10C.pdf

2MB

[Save](#)

● [Donna Anders](#)

To

● [dr\\_taitz@yahoo.com](#)

cc

● [orly.taitz@gmil.com](#)

● 1 Attachment

● 2.5MB

● [Save to](#)

● PDF

R12-20-10C.pdf

2MB

[Save](#)

Dr. Taitz:

Attached is the transcript in PDF format. This is the third time I am sending this. Any questions, please don't hesitate to call me. The clerk's office will be sending the invoice and the hard copy of the transcript. There is a balance due. I may be contacted at 856-589-9005.

Donna

From: Donna Anders <[anders.donna@ymail.com](mailto:anders.donna@ymail.com)>  
Subject: Re: Liberi v. Taitz, et al  
To: "Dr. Orly Taitz ESQ" <[dr\\_taitz@yahoo.com](mailto:dr_taitz@yahoo.com)>  
Date: Sunday, January 9, 2011, 1:39 PM

Dr. Taitz:

Attached is the revised transcript. I myself will be out of the office Monday. You may call me any time after 12:00 and we can discuss the corrections. The scanning process was not working properly and those pages were omitted. I do apologize.

Donna

---

**From:** Dr. Orly Taitz ESQ <[dr\\_taitz@yahoo.com](mailto:dr_taitz@yahoo.com)>  
**To:** Donna Anders <[anders.donna@ymail.com](mailto:anders.donna@ymail.com)>  
**Sent:** Fri, January 7, 2011 7:01:12 PM  
**Subject:** Re: Liberi v. Taitz, et al

Donna

I received it on my yahoo account and I noticed several mistakes and typos that need to be corrected. Please, call me [949-683-5411](tel:949-683-5411), so I can advise you of the areas of errors. I will be in court on Monday until 11 PST. I will be at my office from 11 or 12 PST. Please call me to correct those errors

Dr. Orly Taitz ESQ  
29839 Santa Margarita Pkwy ste 100  
Rancho Santa Margarita Ca 92688  
ph. [949-683-5411](tel:949-683-5411)  
fax [949-766-7603](tel:949-766-7603)  
[orlytaitzesq.com](http://orlytaitzesq.com)  
[drtaitz.com](http://drtaitz.com)  
[taitzofficesuites.com](http://taitzofficesuites.com)

--- On Fri, 1/7/11, Donna Anders <[anders.donna@ymail.com](mailto:anders.donna@ymail.com)> wrote:

From: Donna Anders <[anders.donna@ymail.com](mailto:anders.donna@ymail.com)>  
Subject: Liberi v. Taitz, et al  
To: [dr\\_taitz@yahoo.com](mailto:dr_taitz@yahoo.com)  
Date: Friday, January 7, 2011, 11:45 AM





**R12-20-10C.pdf**  
2771K [View](#) [Download](#)



Orly Taitz <orly.taitz@gmail.com>

1/9/11

to bcc: me, bcc: Neil, bcc: Ed, bcc: Lynda



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2771K [View](#) [Download](#)



Dr. Orly Taitz ESQ <dr\_taitz@yahoo.com>

1/10/11

to

Dr. Orly Taitz ESQ  
29839 Santa Margarita Pkwy ste 100  
Rancho Santa Margarita Ca 92688  
ph. [949-683-5411](tel:949-683-5411)  
fax [949-766-7603](tel:949-766-7603)  
[orlytaitzesq.com](http://orlytaitzesq.com)  
[drtaitz.com](http://drtaitz.com)  
[taitzofficesuites.com](http://taitzofficesuites.com)

--- On Sun, 1/9/11, Dr. Orly Taitz ESQ <[dr\\_taitz@yahoo.com](mailto:dr_taitz@yahoo.com)> wrote:

From: Dr. Orly Taitz ESQ <[dr\\_taitz@yahoo.com](mailto:dr_taitz@yahoo.com)>  
Subject: Fw: Re: Liberi v. Taitz, et al  
To: redacted  
cc: "Orly Taitz" <[dr\\_taitz@yahoo.com](mailto:dr_taitz@yahoo.com)>, [orly.taitz@yahoo.com](mailto:orly.taitz@yahoo.com), [orly.taitz@gmail.com](mailto:orly.taitz@gmail.com)  
Date: Sunday, January 9, 2011, 4:28 PM



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2771K [View](#) [Download](#)



Dr. Orly Taitz ESQ <dr\_taitz@yahoo.com>

1/12/11

to Donna

Ms Anders,

I got a corrected transcript only after I raised this issue. I do not believe that one can miss the whole cross examination by error. You can miss a word or a sentence, but not a whole cross examination, not 14 pages.

Additionally, your original excuse of scanner malfunction made no sense, it looked like a cover up. Scanner does not malfunction from the middle of the page. I intend to go with this to proper authorities and demand investigation. There were multiple problems in this court with documents

not being docketed, removed from the docket. There are a number of serious concerns. I am asking you again, did you do, what you were told to do by someone? If so, by whom?

Please, don't try to threaten me with the "seize and desist" demands. I am simply providing the public with the information of what happened. Clearly you would state that it was not intentional. I believe it was intentional, as a number of other things that I observed in that court. I am within my right to demand investigation by different authorities. 2 certified copies of the same transcript with 14 pages difference warrant investigation. If this was done to me, it can be done to others. The public has a right to know, what is going on in courts.

Dr. Orly Taitz ESQ  
29839 Santa Margarita Pkwy ste 100  
Rancho Santa Margarita Ca 92688  
ph. 949-683-5411  
fax [949-766-7603](#)  
[orlytaitzesq.com](#)  
[drtaitz.com](#)  
[taitzofficesuites.com](#)

--- On Wed, 1/12/11, Donna Anders <[anders.donna@ymail.com](mailto:anders.donna@ymail.com)> wrote:

**From:** Donna Anders <[anders.donna@ymail.com](mailto:anders.donna@ymail.com)>  
**Subject:** Re: Liberi v. Taitz, et al  
**To:** "Dr. Orly Taitz ESQ" <[dr\\_taitz@yahoo.com](mailto:dr_taitz@yahoo.com)>  
**Date:** Wednesday, January 12, 2011, 1:39 PM

Dr. Taitz:

Attached is the response to this e-mail.

Donna

---

**From:** Dr. Orly Taitz ESQ <[dr\\_taitz@yahoo.com](mailto:dr_taitz@yahoo.com)>  
**To:** Donna Anders <[anders.donna@ymail.com](mailto:anders.donna@ymail.com)>  
**Sent:** Tue, January 11, 2011 3:07:51 PM  
  
**Subject:** Re: Liberi v. Taitz, et al

there is a disciplinary hearing of the Supreme Court of PA scheduled against attorney Philip Berg. Originally you removed from the transcript the cross examination, that was detrimental to Berg.

You claimed that it was a problem with the scanner, but it is clearly not a scanner. There are multiple indications, that it is not a scanner.

I am filing a complaint about this matter. I just need to know, if this was your idea, than you are the only person responsible, or whether you were told by someone to do it , and you were just doing what you were told by someone?

Dr. Orly Taitz ESQ  
29839 Santa Margarita Pkwy ste 100  
Rancho Santa Margarita Ca 92688  
ph. [949-683-5411](#)  
fax [949-766-7603](#)  
[orlytaitzesq.com](#)  
[drtaitz.com](#)  
[taitzofficesuites.com](#)

--- On **Mon, 1/10/11, Donna Anders <[anders.donna@ymail.com](mailto:anders.donna@ymail.com)>** wrote:

**From:** Donna Anders <[anders.donna@ymail.com](mailto:anders.donna@ymail.com)>  
**Subject:** Re: Liberi v. Taitz, et al  
**To:** "Dr. Orly Taitz ESQ" <[dr\\_taitz@yahoo.com](mailto:dr_taitz@yahoo.com)>  
**Date:** Monday, January 10, 2011, 5:04 PM

Dr. Taitz:

After reading your e-mail, I went back and checked what I had sent previously, and discovered I had sent you the transcript that was not proofread. Attached is the proofread PDF of the transcript. This is proofread back with the original disk taken in the courtroom. I hope you find this satisfactory. I will send an invoice in a separate invoice.

I do apologize.

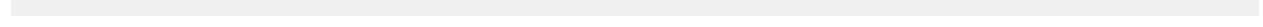
Donna

---

**From:** Dr. Orly Taitz ESQ <[dr\\_taitz@yahoo.com](mailto:dr_taitz@yahoo.com)>  
**To:** Donna Anders <[anders.donna@ymail.com](mailto:anders.donna@ymail.com)>  
**Sent:** Mon, January 10, 2011 6:46:39 PM

**Subject:** Re: Liberi v. Taitz, et al

Donna  
there is still information missing. I remember specific questions and answers and those are not there. This is extremely troubling. I demand a full transcript ASAP



IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

LISA LIBERI, et al : CIVIL ACTION NO. 09-1898

v

ORLY TAITZ, a/k/a :  
DR. ORLY TAITZ; a/k/a :  
a/k/a WWW.REPUBX.COM, : Philadelphia, Pennsylvania  
a/k/a ORLY TAITZ, INC., : December 20, 2010  
et al, : 2:39 p.m.

TRANSCRIPT OF HEARING  
BEFORE THE HONORABLE EDUARDO C. ROBRENO  
UNITED STATES DISTRICT JUDGE

APPEARANCES:

For the Plaintiffs: PHILIP J. BERG, ESQUIRE  
Law Offices of  
Philip J. Berg  
555 Andorra Glen Court  
Suite 12  
Lafayette Hill, PA 19444

For Defendant Taitz: ORLY TAITZ, ESQUIRE  
Law Offices of Orly Taitz  
26302 La Paz  
Suite 211  
Mission Viejo, CA 92691

*Transcribers Limited*

17 Rickland Drive  
Sewell, NJ 08080  
856-589-6100 • 856-589-9005

148

1                   **I N D E X**

2                   PLAINTIFFS' WITNESSES    DIRECT   CROSS   REDIRECT   RECROSS

3                   Lisa Liberi

4                   By Mr. Berg                   22

5                   By Ms. Taitz                   55

6                   Lisa Ostella

7                   By Mr. Berg                   96

10                  DEFENDANT'S' WITNESS    DIRECT   CROSS   REDIRECT   RECROSS

11                  Philip J. Berg

12                  By Ms. Taitz                   125

13                  \* \* \*

1  
2  
3  
4  
5  
6 CERTIFICATION  
7

8 I, Matthew Tilghman, do hereby certify that  
9 the foregoing is a true and correct transcript from the  
10 electronic sound recordings of the proceedings in the  
11 above-captioned matter.

12

13

14

11/6/11

15 Date

Matthew Tilghman

16  
17  
18  
19  
20  
21  
22  
23  
24  
25

125

1 that.

2 (Recess, 5:12 p.m. to 5:20 p.m.)

3 THE COURT: Okay. Let's proceed. Mr. Berg,  
4 please take the stand, and would you swear Mr. Berg?

5 PHILIP BERG, Defendants' Witness, Sworn.

6 COURTROOM DEPUTY: Please state your name and  
7 spell your last name for the record, please.

8 THE WITNESS: Philip J. Berg, B-E-R-G.

9 THE COURT: Okay. Let's proceed, please.

10 DIRECT EXAMINATION

11 BY MS. TAITZ:

12 Q Mr. Berg, you have filed this lawsuit for liable  
13 and slander, is that correct?

14 A Among other things, yes.

15 Q In your pleadings, in your complaint, you stated  
16 that you have a staff of people working for you,  
17 office, that you are a highly respected attorney, a  
18 staff of people working for you, and Ms. Liberi is  
19 highly skilled legal assistant, is that correct?

20 A Yes.

21 Q Mr. Berg, how did you start working with Ms.  
22 Liberi?

23 MR. BERG: Your Honor, I'm going to object to  
24 this, not relevant to the proceeding before you.

25 THE COURT: Sustained.

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

LISA LIBERI, et al : CIVIL ACTION NO. 09-1898

v

ORLY TAITZ, a/k/a :  
DR. ORLY TAITZ; a/k/a :  
a/k/a WWW.REPUBX.COM, : Philadelphia, Pennsylvania  
a/k/a ORLY TAITZ, INC., : December 20, 2010  
et al, : 2:39 p.m.

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555 Andorra Glen Court  
Suite 12  
Lafayette Hill, PA 19444

For Defendant Taitz: ORLY TAITZ, ESQUIRE  
Law Offices of Orly Taitz  
26302 La Paz  
Suite 211  
Mission Viejo, CA 92691

*Transcribers Limited*

17 Rickland Drive  
Sewell, NJ 08080  
856-589-6100 • 856-589-9005



1  
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6 CERTIFICATION

7  
8 I, Matthew Tilghman, do hereby certify that  
9 the foregoing is a true and correct transcript from the  
10 electronic sound recordings of the proceedings in the  
11 above-captioned matter.

12  
13  
14  
15 Date 1/6/14

Matthew Tilghman  
Matthew Tilghman

16  
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24  
25

Ms. Ostella - Direct

121

1 A No, no.

2 Q That's not. But other documentation still is, is  
3 that correct?

4 A Yes.

5 MR. BERG: Cross-examine. Or I'm sorry, Your  
6 Honor.

7 THE COURT: Okay. Cross-examination.

8 (Pause in proceedings.)

9 CROSS-EXAMINATION

10 BY MS. TAITZ:

11 Q Ms. Ostella, isn't it true, and you stated this,  
12 that you were administrator -- you were the  
13 administrator for the website, Defend Our Freedoms  
14 Foundation, and you locked me out of that website, yes  
15 or no?

16 A defendourfreedoms.com, .org, .us, yes, I was web  
17 administrator.

18 Q You --

19 A And I --

20 Q And you locked --

21 A -- did lock you out.

22 Q Okay. You locked me out?

23 A Yes.

24 Q After you locked me out isn't it true that you  
25 continued sending e-mails to donors soliciting

Ms. Ostella - Cross

122

1       donations?

2       A     No.

3       Q     Ma'am --

4       A     Can I see one of those e-mails?

5                  MS. TAITZ: Your Honor --

6                  THE COURT: Excuse me, that -- the answer is  
7       no.

8                  THE WITNESS: I'm sorry, no.

9                  THE COURT: Okay. Next question.

10                 MS. TAITZ: Your Honor, I believed that this  
11       is hearing only about TRO. I do not have those e-mails  
12       right now, however, I will testify, and I am testifying  
13       under penalty of perjury, that numerous donors have  
14       received e-mails from Ms. Ostella asking for donations.

15                 THE COURT: Well, as I said to you, this is a  
16       preliminary hearing.

17                 MS. TAITZ: Yeah.

18                 THE COURT: There may be -- there may be a  
19       need for further hearings and further evidence --

20                 THE WITNESS: You have my --

21                 THE COURT: -- so your --

22                 THE WITNESS: You have a copy of my PayPal --

23                 THE COURT: Excuse me a minute.

24                 THE WITNESS: -- accounts with the material.

25                 THE COURT: Please.

Ms. Ostella - Cross

123

1 THE WITNESS: I'm sorry.

2 (Pause in proceedings.)

3 THE COURT: You will have an opportunity --

4 MS. TAITZ: Okay.

5 THE COURT: -- if there is a further hearing.

6 MS. TAITZ: Yes.

7 THE COURT: As I said, there are other issues  
8 involved here, damages, professional conduct, a number  
9 of other issues that may require further explanation.

10 MS. TAITZ: Okay.

11 THE COURT: At this point your answer is no,  
12 and then --

13 MS. TAITZ: Okay.

14 THE COURT: -- you can ask the next question.

15 BY MS. TAITZ:

16 Q Ms. Ostella, after you locked me out I had to  
17 create a new website, and I created website  
18 orlytaitzesq.com, is that correct?

19 A No, you went to repubix next --

20 Q And then -- and then I created --

21 A -- and then orlytaitzesq.com, correct.

22 Q Okay. So I created my own website?

23 A Correct.

24 Q And my PayPal was connected to orlytaitzesq.com,  
25 that's right?

Ms. Ostella - Cross

124

1 A I -- yeah. I -- yeah.

2 Q So the PayPal that was connected to the old account  
3 was your account, right? Yes or no?

4 A You are talking about a virtual -- a virtual  
5 terminal versus a PayPal button so there is a  
6 differentiation between how you're saying that.

7 Q But it was -- okay. It was a PayPal account where  
8 people could donate, right?

9 A Correct.

10 Q So after you locked me out, you replaced my PayPal  
11 account with your own PayPal account on --

12 A Yes.

13 Q -- that website?

14 A Yes.

15 Q So when people, my donors, went on my old website,  
16 Defend Our Freedoms, instead of donating to me so I can  
17 work they were donating to you, right?

18 A Actually, I have my PayPal accounts in with the  
19 papers I gave you, and it shows no donations to --

20 Q But --

21 A -- Defend Our Freedoms.

22 Q And we will verify how much you received and how  
23 much you didn't receive.

24 But after you locked me out you replaced the  
25 account, so after I was locked out anybody who were to

Ms. Ostella - Cross

125

1       donate or not to donate would go to your personal  
2       account, is that correct?

3       A     Would.

4       Q     Yes. Okay. Now, let me ask you --

5                   THE COURT: But you're saying no one did?

6                   THE WITNESS: No one did and my PayPal  
7       records are in the book, sir.

8                   MS. TAITZ: Your Honor, I actually do have  
9       records showing that indeed --

10                  THE COURT: Okay, fine.

11                  MS. TAITZ: -- that happened.

12                  THE WITNESS: It would still be in my PayPal  
13      account.

14      BY MS. TAITZ:

15      Q     Now, I will have to subpoena your PayPal account.

16      A     Go ahead.

17      Q     I have this from the donors. Now, isn't it true  
18      that in regards to this website, lisaliberi.com, and  
19      you stated before that the only connection that you  
20      have is with Mr. Staples, not with me?

21      A     Correct.

22      Q     Okay.

23      A     And that's all I've said --

24      Q     Okay.

25      A     -- in my affidavits.

Ms. Ostella - Cross

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1 Q Okay. So you are the expert for Berg and Liberi  
2 and you are saying that the subject of this TRO,  
3 lisaliberi.com, is only connected to Mr. Staples and  
4 not to me, is that correct?

5 A No, I didn't differentiate that. I said I have  
6 proof of Jeff Staples --

7 Q Okay. Only --

8 A -- not proof of you.

9 Q That's right. Okay. I wanted to ask just one more  
10 question. Through Mr. Berg you have submitted to Third  
11 Circuit Court of Appeals and court in Florida --

12 A Yes.

13 Q -- a statement that I allowed you to sign  
14 documents, is that correct?

15 A And I backed that up, too, with my material I  
16 submitted to that court.

17 Q Okay.

18 MS. TAITZ: Your Honor, I wanted to show you  
19 the documents that were submitted to Third Circuit  
20 Court of Appeals and a court in Florida that they  
21 submitted, if I can --

22 THE WITNESS: That doesn't look like the  
23 Pacer docket.

24 MR. BERG: Do you have a copy that I can see?

25 MS. TAITZ: Sure.

Ms. Ostella - Cross

127

1 THE COURT: Well, let's see. What do you  
2 purport this to be?

3 MS. TAITZ: This is forgery. I never --

4 THE COURT: No, but what is -- where does it  
5 come from?

6 MS. TAITZ: It says from Lisa Ostella. They  
7 have provided this to me and Mr. Berg.

8 THE COURT: You're saying these documents  
9 have been filed with a court?

10 MS. TAITZ: Yes.

11 THE WITNESS: Yes, but that is not the  
12 Pacer --

13 THE COURT: And they --

14 THE WITNESS: -- docket.

15 THE COURT: And they purport to have your  
16 signature?

17 MS. TAITZ: Ms. Ostella claimed that I  
18 allowed her to sign documents.

19 THE COURT: Okay.

20 MS. TAITZ: If you were to look at this -- if  
21 somebody allows you to sign documents, you would see  
22 that it's signed a little bit differently one time,  
23 another time.

24 And if you look at those documents, it's  
25 clearly a forgery. You can see that they took my

Ms. Ostella - Cross

128

1 signature from a document and cut and pasted it on  
2 multiple documents.

3 THE WITNESS: Yes, I did with her permission.

4 BY MS. TAITZ:

5 Q Okay. So you are saying that I permitted you to --  
6 to cut my signature from a document and paste it on  
7 many documents?

8 A I --

9 Q Is that what you're saying?

10 A And I did that on more than subpoenas. I did that  
11 on dossiers and letters you sent out too. I live in  
12 New Jersey, you live in California. We're not in the  
13 same office. I had permission to sign documents to  
14 you. I sent them out to the servers to sub --

15 Q Ma'am --

16 A -- for the subpoenas to be served.

17 Q Ma'am, if you can look at this document, you can  
18 see that the signature -- what -- it's the same  
19 signature on a number of documents.

20 A Yes.

21 Q Can you -- how -- can you explain how could it  
22 happen that if I were to allow it to you, how did it  
23 happen that on a document that you claim that I've  
24 allowed you to sign, cut and paste, in January there  
25 was a signature that was from April, three months

Ms. Ostella - Cross

129

1 later? How could that happen?

2 A I --

3 Q You took --

4 A -- don't understand.

5 Q You took a document that I signed in April of 2009  
6 and then you cut and pasted signature --

7 A That's the same --

8 Q -- on documents that were sent --

9 A That's the same signature.

10 Q -- several months earlier.

11 A I had your signature in a bit map on my computer.

12 Q Ma'am, every person signs documents a little bit  
13 differently.

14 A Not when you use a rubber stamp.

15 Q Do I have a rubber stamp?

16 A No, I had a bit map for your rubber stamp.

17 Q So you have -- you have created a rubber stamp with  
18 my signature?

19 A No, I had a bit map for your rubber stamp.

20 Q Okay. So you -- okay.

21 THE COURT: Okay. So next -- next area. Do  
22 you have anything else, Ms. Taitz?

23 MS. TAITZ: Okay, yes.

24 BY MS. TAITZ:

25 Q Ma'am, have you -- you have accused me of -- of

Ms. Ostella - Cross

130

1 stalking you and you have accused me -- I mean I am an  
2 attorney and you have accused me of trying to hire a  
3 hitman to kidnap your children.

4 A I did not make those statements.

5 Q Who made those statements?

6 A Those weren't made by me.

7 Q But can you tell me who made those statements?

8 Where --

9 A They are in the court filings on this.

10 Q And who made those --

11 A I don't know who writes what.

12 Q And who made those court filings?

13 A They came from my attorney's law office.

14 Q You mean they came from Mr. Berg, right?

15 A His law office, yes.

16 Q And how did he come up with this idea that I tried  
17 to hire somebody to kidnap your children? Can you  
18 explain?

19 A Oh, that?

20 Q Yes.

21 A That wasn't hitman. That was different. Are you  
22 talking about -- okay. Because if you're talking about  
23 the kidnapping of my children, that was --

24 Q Yes.

25 A -- different from Ruben Nieto.

Ms. Ostella - Cross

131

1 Q Okay. How -- I mean you -- you have accused me of  
2 serious crimes.

3 A Yes, I have.

4 Q And on what basis?

5 A And I stand on them.

6 Q Okay. What's the basis?

7 A You came to New Jersey after the last court date  
8 and drove around New Jersey, drove past my child's  
9 school, drove past my house.

10 Q Ma'am --

11 A I --

12 Q Ma'am, excuse me. Where -- from what -- where do  
13 you get it? You -- there is -- there is -- I -- there  
14 is no evidence to that. I would --

15 A Yes, there is.

16 Q I went to New Jersey to report you, report the fact  
17 that you locked me out of the account of my foundation  
18 and you replaced my PayPal with your PayPal. I went to  
19 New Jersey to report diversional funds from my  
20 foundation. Instead, you accuse me of going to New  
21 Jersey to kidnap your children. From what?

22 A No, I didn't accuse you of going to kidnap my  
23 children on that trip. I have an affidavit.

24 THE WITNESS: Tab K, sir, in the binder I  
25 gave you.

Ms. Ostella - Cross

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1 THE COURT: To what effect?

2 THE WITNESS: Tab K is the gentleman that was  
3 with her when she drove around New Jersey.

4 MS. TAITZ: He is not here. This is -- he is  
5 the --

6 THE WITNESS: His affidavit is here.

7 MS. TAITZ: But this is hearsay. I cannot  
8 question him.

9 THE WITNESS: Affidavits are not hearsay.

10 BY MS. TAITZ:

11 Q Does it say anywhere in his affidavit that I was  
12 trying to kidnap your children?

13 A No, I didn't say it was.

14 Q Does it say that I went to report you to the  
15 police, yes or no?

16 A Yes, you came --

17 Q Okay. Thank you.

18 A -- here, drove past --

19 Q No more --

20 A -- my house.

21 MS. TAITZ: That is all.

22 THE WITNESS: No, she's cutting off my  
23 statement.

24 THE COURT: Okay. Thank you. You may step  
25 down, ma'am. Okay.

## **EXHIBIT 8**

**AUGUST 27, 2017, BERG PROMOTING  
"OBAMASCARE" BOOK**

**WHERE A FULL CHAPTER IS DEVOTED TO VICIOUS  
DEFAMATION OF TAITZ**

#18506

[orly.taitz@hushmail.com](mailto:orly.taitz@hushmail.com) | [Contacts](#) | [Preferences](#) | [Help](#) | [Sign Out](#)



[Check mail](#)

[Compose](#)

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Inbox  
Sent  
Drafts  
Junk  
Trash

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300  
726

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## Re: I have BCC'd a myriad of Constitutionalists (aka Birthers)

Philip Berg to Gary W., Sharon Rondeau, Andrea Shea King, Arien Williams, Bettina Viviano, Bob Neison, Brian Wilmott, Burgess Owens, Cari Gallup, Cari Swensson, Charles Kerchner, Cort Wrotowski, Dale Laudenstager, David LaRocque, Diana West, Don Frederick, Dr. Kate Vandemaer, Ed Sunderland, Edward C. Noonan, Erik Rush, Floyd Brown, Gary Laconis, Gary Laconis, George Miller, Harry Accornero, Harry Wilmott, JB Williams, Jack Cashill, Jeff Harrison, Jeff LICHTER, Jerome Corsi, Joan Swirsky, Karen Kiefer, Kevin Powell, LL Wilkinson, Ladysforest, Larry Conti, Laurie Roth, Lawrence Sellin, Linda Bentley, Lloyd Marcus, Mara Zebest, Marco Ciavolino, Mario Apuzzo, Mark Gillar, Michael Volin, Mike Lerman, Neil Sankey, Neil Turner, Neil Turner, Nellie Ristvedt, Orly Taitz, Pamela Barnett, Pat Boone, Paul Irey, Peter Boyles, Randy Foreman, Rob Lamb, Robert Rosenberg, Roger Ogden, Steve Yantzer, TPATH, Terry Lakin, Tom Ballantyne, Tony Dolz, Voni McGrath (6 hours ago) [show details](#) [create a rule](#)

I agree !

A good start would be to promote my book, ObamaScare, as it details Obama as a Fraud, Phony, Liar & Imposter ! Obama was Born in Kenya and always was Constitutionally INeligible to be president. It also details 40 of Obama's wrongs including Benghazi, IRS, AP, etc.

On Sun, Aug 27, 2017 at 8:12 PM Gary W <gmw0411@att.net> wrote:

**Thought: Can we leverage Sheriff Joe and his presidential pardon to bring attention and a favorable resolution to Terry Lakin's situation?**

Enough is enough. I am sick and tired of the despicable media and self-serving frauds in Congress who refuse to report the truth or do the RIGHT thing! The media and most people in Congress are our enemy!

If we want to make America great again we first need to take back our country!

Obama and his thugs and the evil media need to FINALLY be

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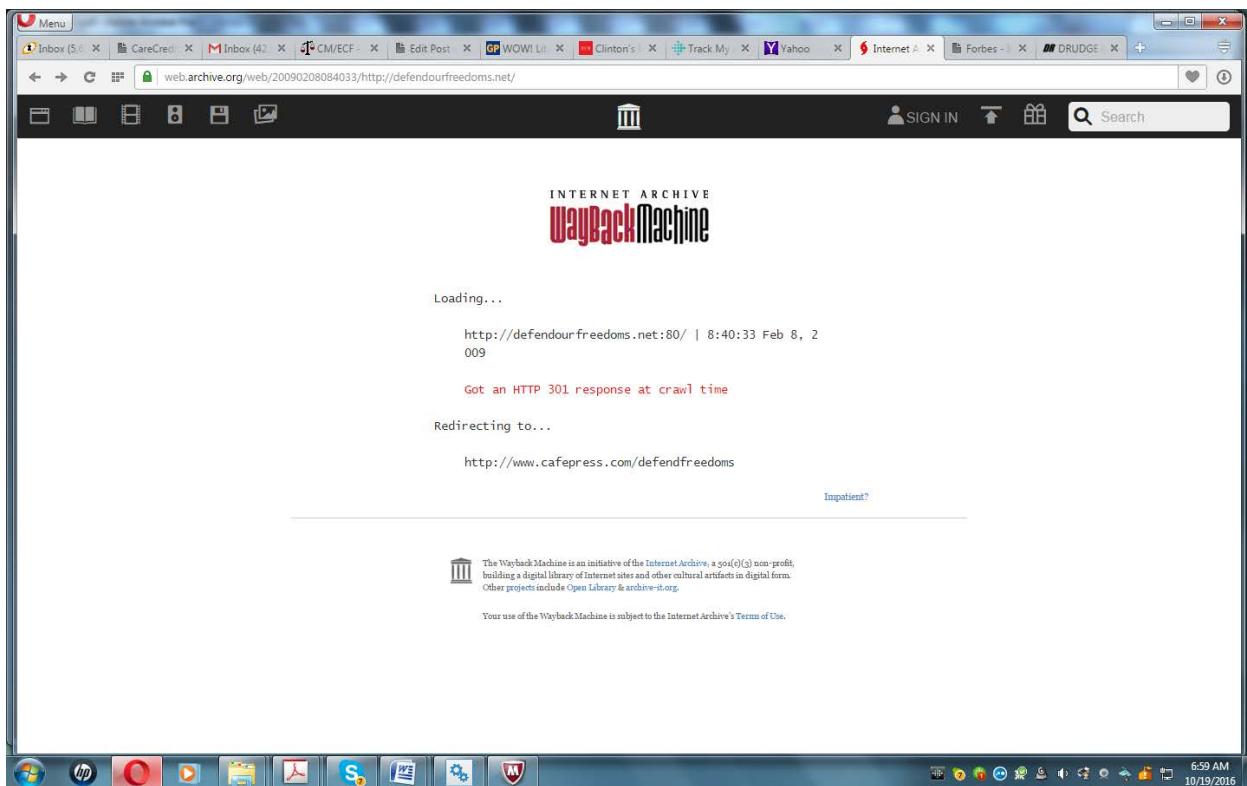
[Previous](#) [13 of 19392](#) [Next →](#)

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## **EXHIBIT 9**

**Ostella using defendourfreedoms.net for  
caffepress.com link to sell t-shirts.**

**No accounting and no money was transferred to DOFF  
by Ostella**



## **EXHIBIT 10**

### **THEFT OF SOCIAL SECURITY NUMBER OF TAITZ**



FRESNO CA 93888-0025

In reply refer to:  
Feb. 05, 2014 LTR

ORLY TAITZ



004908

Taxpayer Identification Number:  
Tax Period(s):

Form: 1040

Dear Taxpayer:

We regret that we sent you an incorrect refund for mail. The refund, dated Apr. 16, 2012, was for the Dec. 31, 2011, tax period. We sent this refund to you in error because there was an issue of identity theft on your account.

To correct this error, please attach this letter to your next tax return or mail it to us at the address above. We will then withhold the refund amount from

## **EXHIBIT 11**

**Examples of e-mails from donors stating  
that their donations were diverted from  
DOFF. Lisa Ostella writing to donor an  
explanation for the problem and not  
blaming it on a computer glitch, but rather  
blaming another person, a moderator on  
the web site, for changing the e-mail  
address, which led to diversion of  
donations**

Dr. Orly Taitz ESQ, search your mailbox

Home Orly

Compose Search results Archive Move Delete Spam More

Add Gmail, Outlook, AOL and more

Inbox (9999+) Kathleen V. [REDACTED] 03/28/09 at 5:38 PM  
To: dr\_taitz@yahoo.com

Drafts (20) Sent Archive Spam (2309) Trash (50)

Smart Views Important Unread Starred People Social Shopping Travel Finance suntrust

> Folders (1)

> Recent

Fw: RE: Donation to DOFF February 25, 2009

Dear Orly,

I wrote to Lisa Ostella and this was her answer to me about the paypal donation of 100.00 on February 25. I will try to get money to you, but am still trying to find out what happened to the original 100.00 I sent. If you haven't received it and it wasn't returned to me, where is it? I still wonder what's going on and I will try to solve it. Is Lisa Ostella one of your people? Kathleen

--- On Sat, 3/28/09, Lisa Ostella <lisaostella@hotmail.com> wrote:

From: Lisa Ostella <lisaostella@hotmail.com>  
Subject: RE: Donation to DOFF February 25, 2009  
To: kathleenv[REDACTED]@gmail.net  
Date: Saturday, March 28, 2009, 10:29 AM

A moderator from the site board, who no longer works with us, changed Orly's email to: gmail.org

This has been resolved.

Her PayPal email is orly.taitz@gmail.com

Now, below, you said the money was charged back and you also said you haven't received it. I don't understand.

Our methods we have is snail mail and PayPal. Sorry if you aren't comfortable with that.

Lisa Ostella  
Defend Our Freedoms Foundation  
<http://defendourfreedoms.org>  
Peace through Strength  
<http://www.barofintegrity.com>

Date: Sat, 28 Mar 2009 07:13:41 -0700  
From: kathleenv[REDACTED]@gmail.net  
Subject: Donation to DOFF February 25, 2009  
To: lisaostella@hotmail.com

Hello Lisa,

I sent a 100.00 donation to Orly through my paypal account on February 25. The money was charged to my credit card within the next few days. Yesterday, I got a letter from pp saying that Orly did not sign up for her recipient account @gmail.com and the transaction could not be completed. This makes no sense, and furthermore, doesn't explain why they held onto the money for more than a month. The money has not been credited back to me yet.

Just to let you know, I intend to cancel my paypal account now. To be honest, I do not think that sending a hard check or a cashier's check to Mrs. Taitz' address is safe. What do you recommend?

Kathleen V. [REDACTED]

Quick access to Windows Live and your favorite MSN content with [Internet Explorer 8](#).

A comment regarding "Breaking and entering into my PayPal account", an entry at [DEFENDOURFREEDOMS.US](http://DEFENDOURFREEDOMS.US), was written at 3/9/2009 2:24:45 PM.

Author: Pat  
IP Address: [REDACTED]  
Email Address: [REDACTED]  
Home Page:

Comment:

Hi!

I wrote to you many weeks back as we tried on several occasions to send money via Paypal to you but we did not hear back from anyone. We reported the problems we were having trying to send donations and when we did not hear back we could only assume that you were not interested.

We wanted to do something to help and also offered to send letters out to elected officials as well in order to help with the costs of printing...still no reply.

We know there was no problem on our end as we donate to many causes via Paypal and had no problems, so we wanted to alert you to the problem.

I would strongly recommended a P.O. box. Next thing you know someone will be stealing your mail. At least at a PO box they is under lock and you would be the only one with a key.

Thanks

A comment regarding "Breaking and entering into my PayPal account", an entry at [DEFENDOURFREEDOMS.US](http://DEFENDOURFREEDOMS.US), was written at 3/9/2009 9:56:37 AM.

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Author: Martin SC

IP Address: [REDACTED]

Email Address: [REDACTED]

Home Page:

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Comment:

I just checked Pay-Pal & a donation that I sent through on 3-6-09 was diverted to the (Hacked Address) see below. Under "Status".... is said "Unclaimed", so I cancelled it. If donations have been claimed.... does it count the same as "Snail Mail" fraud which is a Felony offence?

Get 'em Dr. Orly !!! Can you believe the nerve of someone who would mess with the relentlessness of Dr. Taitz..... Jail time pending if those donations show up as "Claimed".... Add this mess the the "Eric Holder Letter... for the special Prosecutor to deal with.

From Pay-Pal website:

Do you want to cancel this payment?

Payment Type: Donation Sent

Transaction ID: 9WF64738J72645149

Email: [orly.taitz@gmail.org](mailto:orly.taitz@gmail.org)

Date: Mar. 6, 2009

Time: 14:58:32 PST

Status: Canceled

Amount: -\$25.00 USD

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You can perform the following actions on this comment:

- [Approve](#) this comment.
- [Reply](#) to this comment.

This is an automated message.

A comment regarding "Breaking and entering into my PayPal account", an entry at [DEFENDOURFREEDOMS.US](#), was written at 3/15/2009 9:41:43 AM.

Author: Monica C.

IP Address: [REDACTED]

Email Address: [REDACTED]

Home Page:

Comment:

ok. i'm concerned now... i've just gone back over my paypal account online, and my receipt, and it appears my contribution may have gone elsewhere as well:

Business Name:

Defend Our Freedoms (The recipient of this payment is Verified)

Email:

[lisaostella@hotmail.com](mailto:lisaostella@hotmail.com)

i attempted to contact paypal regarding this, and was unable to online, via the website or via email. i'm going to call them. they should have to take some responsibility based on the fact that they stated the recipient was verified for "defend our freedoms." (perhaps i'm just too trusting...) so what can we do? or are we just out the donation?

You can perform the following actions on this comment:

- [Approve](#) this comment.
- [Reply](#) to this comment.

This is an automated message.